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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation,
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANNA SABANOGLU IN
SUPPORT OF PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD BE
SEALED [DKT. 468]**

I, Kyanna Sabanoglu, hereby declare:

1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I provide this Declaration based on my personal knowledge and/or after a reasonable investigation of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, (Dkt. 468 (“Sealing Motion”)). Meta seeks leave to file under seal portions of Plaintiffs’ March 5, 2025 Letter re Additional Discovery Proposal (“Plaintiffs’ Letter”).

3. Meta requests the Court’s permission to file under seal narrowly tailored portions of Plaintiffs’ Letter, as set forth in the chart below alongside the relief requested for each:

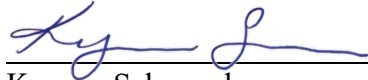
Document	Sealing Request
Sabanoglu Ex. 1 – Plaintiffs’ Letter (Dkt. 481-1)	Redacted portions

4. Attached as **Sabanoglu Exhibit 1** is Plaintiffs’ Letter with Meta’s proposed narrowly tailored redactions. Here, Meta respectfully seeks to redact only information necessary to prevent the disclosure of Meta’s business strategies and negotiations vis-à-vis third parties, including Meta’s internal considerations regarding possible strategic partnerships. Certain of this information involves business discussions that are ongoing. Disclosure of such information risks competitive harm to Meta, including by hampering Meta’s third-party relationship management. The identity of the third-party is also subject to confidentiality and non-disclosure obligations and agreements. Disclosure of such information would put the third party’s confidential information at risk and pose a competitive disadvantage to Meta and the third party who obtained promises of confidentiality from Meta for this information and is not party to this lawsuit. Meta has previously requested to seal documents based on similar third-party information, (*e.g.*, Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

* * *

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed in New York City, New York on this 12th day of March 2025.
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5 
6 Kyanna Sabanoglu